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18 AG

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20 UNITED STATES DISTRICT COURT
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22 NORTHERN DISTRICT OF CALIFORNIA
23
24 SAN FRANCISCO DIVISION

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26 INFINEON TECHNOLOGIES AG,
27 Plaintiff,
28 vs.
VOLTERRA SEMICONDUCTOR
CORPORATION,
Defendant.

Case No. CV-11-6239 (MMC)

**STIPULATION AND [PROPOSED]
ORDER AMENDING PROTECTIVE
ORDER**

Hon. Maxine M. Chesney

1 WHEREAS the Court entered a Stipulated Protective Order on July 17, 2012 (D.I. 104);

2 WHEREAS the parties wish to amend the Stipulated Protective Order to provide
3 additional specificity as to the procedure and timeline for designating materials and addressing
4 requests for access to designated material to ensure that the designation of protected materials
5 does not unnecessarily encumber or retard the case development process;

6 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES that, subject to the
7 approval of the Court, the following provisions shall be added to the Stipulated Protective Order:

8 5.2 . . .

9 (d) Any designation of Protected Material shall specify which party's
10 confidential information is disclosed. For production documents (i.e., a party's documents
11 produced in response to a discovery request), that identification need not be affixed to
12 each specific document but shall be provided simultaneously with the production (e.g., by
13 cover letter accompanying a document production).

14 7.5 **Requests for Access to Designated Materials.** A party that has designated Protected
15 Material shall substantively respond to any reasonable request as to the scope of a designation,
16 request for redaction, or request for re- or de-designation of Protected Material within two (2)
17 business days. Any request for access to designated materials under this paragraph shall be made
18 in good faith, and not to unnecessarily encumber or retard the case development process or to
19 impose unnecessary expenses and burdens on other parties.

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1 Dated: April 8, 2014

WEIL, GOTSHAL & MANGES LLP

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By: /s/ Sonal N. Mehta

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Sonal N. Mehta
Attorneys for Defendant Volterra
Semiconductor Corporation

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Dated: April 8, 2014

BAKER BOTTS L.L.P.

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By: /s/ Aaron Davidson

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Attorneys for Plaintiff
Infineon Technologies AG

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ATTESTATION OF E-FILER

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In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and password are being used to file this document, hereby attests that all signatories have concurred in the filing of this document.

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Dated: April 8, 2014

/s/ Sonal N. Mehta
Sonal N. Mehta

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the following provisions shall be added to the Stipulated Protective Order in this matter:

5.2 . . .

(d) Any designation of Protected Material shall specify which party's confidential information is disclosed. For production documents (i.e., a party's documents produced in response to a discovery request), that identification need not be affixed to each specific document but shall be provided simultaneously with the production (e.g., by cover letter accompanying a document production).

7.5 **Requests for Access to Designated Materials.** A party that has designated Protected Material shall substantively respond to any reasonable request as to the scope of a designation, request for redaction, or request for re- or de-designation of Protected Material within two (2) business days. Any request for access to designated materials under this paragraph shall be made in good faith, and not to unnecessarily encumber or retard the case development process or to impose unnecessary expenses and burdens on other parties.

IT IS SO ORDERED.

Date: April 10, 2014

Maxine M. Chesney
THE HONORABLE MAXINE M. CHESNEY